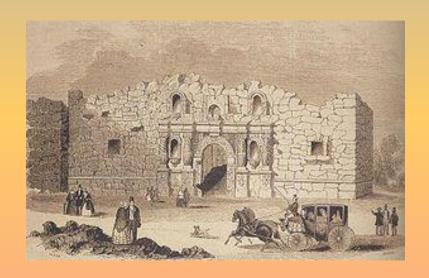
Good Morning



Thank You

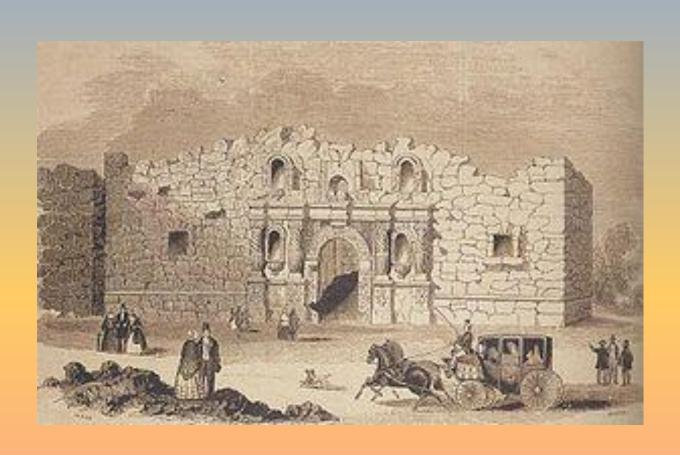
For inviting me to talk with you today

 My pleasure to be here at the historic Alamo



Alamo Siege

February 23 – March 8, 1836



Agenda For Today

Overview of gas plant accounting

- Auditing gas plant statements
 - How do you determine if you have been paid correctly by the gas plant



Gas Plant Accounting



Gas Plant Accounting

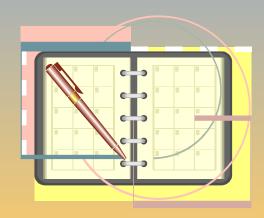
 Will look at gas plant accounting from the plant owner side

 How the plant owner allocates NGL and residue gas production to the gas producers

 How the plant owner reports earning for gas purchased or processed

Gas Plant Accounting Outline

- Definitions
- How gas is processed
- Why gas is process
- Type Contracts
- Simple processing example



Terms Relative to Natural Gas

- Natural Gas main component is methane (CH₄)
 - Home uses
 - Heating
 - Cooking
 - Water heating
 - Industrial uses
 - Generate electricity
 - Industrial fuel
- Measurement of Natural Gas
 - Volumes
 - Mcf Thousand cubic feet
 - Mmcf Million cubic feet
 - Energy content
 - Btu British thermal units
 - Mmbtu Million British thermal units



British Thermal Unit

 Amount of heat or energy needed to raise the temperature of one pound of water one degree Fahrenheit at sea level

Approximately the heat generated by burning one wooded match

The amount of energy needed to lift a one pound weight 778 feet

Terms Relative to Natural Gas

 Wet Gas – contains natural gas liquids (NGLs)

Dry Gas – contains essentially no NGLs

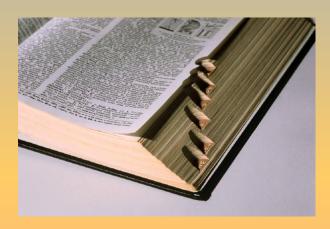
Sour Gas – contains CO₂ and/or H₂S

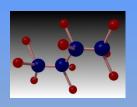
Sweet Gas – no CO₂ or H₂S



Terms Most Commonly Associated With Gas Plants

- Natural Gas Liquids
- Natural Gas Liquid Products
- Plant Shrinkage
- Residue Gas
- GPM





Natural Gas Liquids

- Hydrocarbons that are a vapor under normal temperature and pressure
- Are recovered by processing a wet gas stream at a gas processing plant
- Accounted for in gallons
- May be shipped as a liquid by truck, rail or pipeline

Natural Gas Liquids

oduct	Primary Uses		
C_2H_6	Petrochemical Feedstock		
C ₃ H ₈	Rural home heating, carburation, crop drying		
C ₄ H ₁₀	Blend into winter grade gasoline		
+ C ₅ H ₁₂	Bend into gasoline		
	C ₂ H ₆		

Plant Shrinkage



- Shrinkage in plant inlet gas volume caused by the extraction of NGLs
- Plant Volume Reduction (PVR)
 - Plant shrinkage measured in Mcf that occurs due to the removal of NGLs
- Plant Thermal Reduction (PTR)
 - Plant shrinkage measured in Mmbtu's that occurs due to the removal of NGLs

Residue Gas



 Gas remaining after wet gas is treated to remove contaminants and NGLs

Should meet pipeline gas specifications



GPM

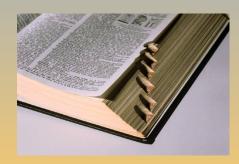


GPM – gallons of NGLs per Mcf gas delivered

 Use to calculate theoretical volumes of NGL products

Terms Most Commonly Associated With Gas Plants

- Theoretical Gallons
- Plant Efficiency
- Raw Make Stream
- Fractionation
- Mol%



Theoretical Gallons

Gas Volume Delivered x GPM Content

Delivered 10,000 Mcf of gas





• Theoretical gallons $10,000 \times 1.25 = 12,500$ gallons

Theoretical Gallons

Delivered 20,000 Mcf of gas

GPM content 1.30



Theoretical gallons 20,000 x 1.30

Theoretical gallons = 26,000 gallon

Plant Efficiency

 The percent of NGLs contained in the plant inlet gas stream recovered through processing

 Example:Inlet gas stream contains 40,000 gallons of NGLs

Actual plant recovery 30,000 gallons

Plant efficiency **75%** (30,000/40,000)



Additional Plant Definitions

 Raw make stream – mixture of NGLs that are removed from the plant inlet gas stream

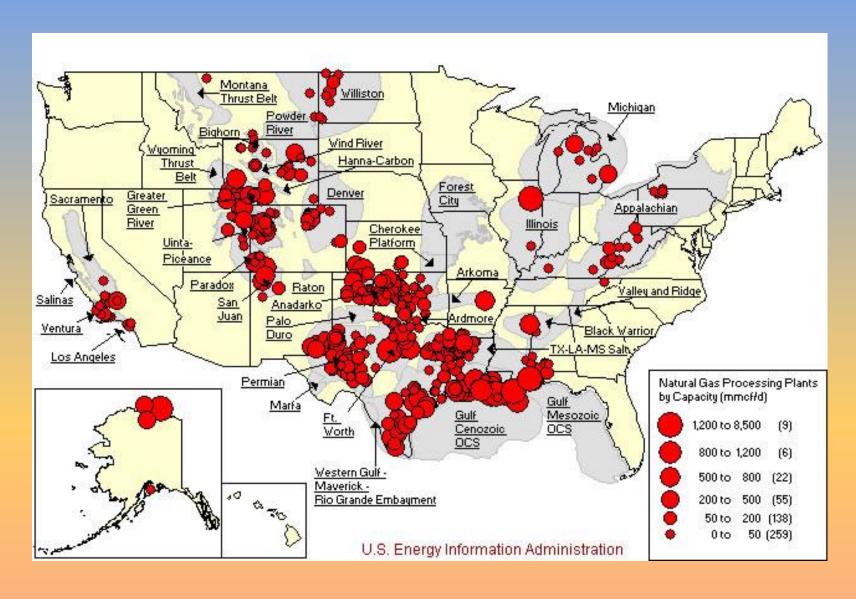
 Fractionation – the process of separating the raw make stream into separate NGL products

Classifications of Gas Plants

- By Design
 - Stationary
 - Skid-Mounted
- By Location
 - Central
 - Straddle
- By Extraction Process
 - Adsorption
 - Absorption
 - Chilled Oil
 - Refrigeration
 - Cryogenic
 - Turbine or Expander
 - Fractionation



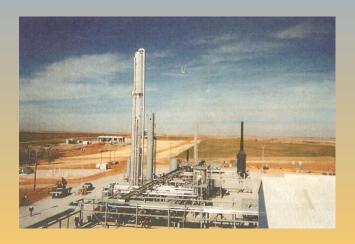
Gas Plants in the United States



United States Plants

- Absorption (chilled oil) plants
 - Older plants
 - No market for ethane

- Cryogenic plants
 - Newer plants
 - Build to recover ethane



Plant Efficiencies

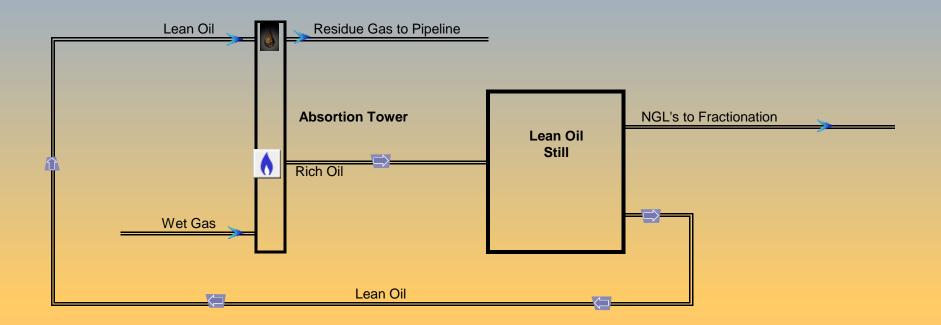
	Product Recovery									
		Chilled			Turbo					
Product	Absortion	Lean Oil	Refrigation	Cryogenic	Expander					
Ethane	-	40%	-	70%	75% - 85%					
Propane	50%	80%	-	95%	98%					
Butanes	75%	85%	70%	98%	99%					
Pentanes +	85% - 90%	95%	85%	99%	99%					

Absorption Gas Plant





Lean Oil Recovery

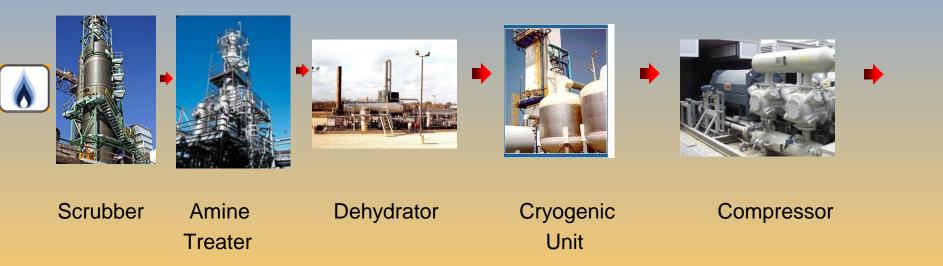


Cryogenic Process



- A rapid pressure drop lowers the temperature of the wet gas stream to (120°) to (150°) Fahrenheit
- A turbine expansion unit can lower the temperature even further to (180°)
 Fahrenheit
- At these low temperature, essentially all ethane and heavier hydrocarbons liquefy

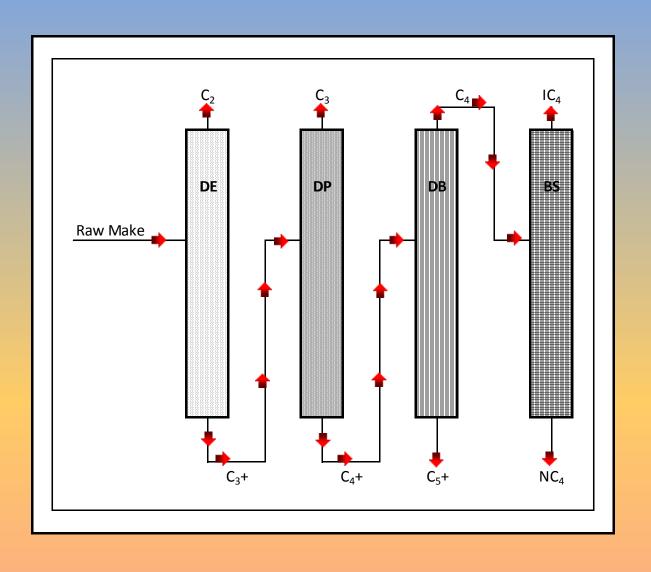
Cryogenic Gas Plant Gas Flow



Hydrocarbon Constants

		Relative	Relative				
		Density	Density	Cf Gas	Btu	Btu	Boiling
Component	Formula	Liquid	Gas	Gal Liquid	Gallon	Cubic Foot	Point F
Methane	CH_4	-0.30000	0.5539	-	-	1,010.0	-258.73
Ethane	C_2H_6	0.35619	1.0382	37.476	65,869	1,769.6	-127.49
Propane	C_3H_8	0.50698	1.5226	36.375	90,830	2,516.1	-43.75
lso-Butane	C ₄ H ₁₀	0.56286	2.0068	30.639	98,917	3,251.9	10.78
N-Butane	C ₄ H ₁₀	0.58401	2.0068	31.790	102,911	3,262.3	31.08
Iso-Pentane	C ₅ H ₁₂	0.62470	2.4912	27.393	108,805	4,000.9	82.12
N-Pentane	C ₅ H ₁₂	0.63111	2.4912	27.674	110,091	4,008.9	96.92
N-Hexane	C ₆ H ₁₄	0.66382	2.9755	24.371	115,021	4,755.9	155.72

Fractionation



Fractionation

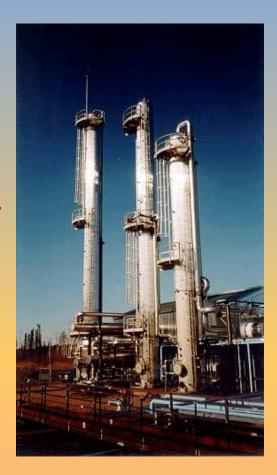
May occur at the gas plant

- May occur at a central fractionation facility
 - Mt Belvieu, Texas
 - Conway, Kansas



Gas Processing

Wet Gas •



♦ NGLs

Residue Gas

Gas Plant Contracts

- Gas Purchase Agreement
 - Plant buys the gas at the measuring point
 - All products belong to the plant

- Gas Processing Agreement
 - Producer retains title to the gas
 - Producer pays the plant owner a processing fee

Purchase Agreement



 Plant may buy the gas at a fixed rate per Mcf delivered to the plant

 Plant may buy the gas based on a percent of the value of products allocated to the gas (POP agreement)

Processing Agreement Fees

 Plant may charge a fixed rate per Mcf delivered to the plant

 Plant may charge a fixed rate per gallon of NGLs recovered from the gas

 Plant may keep a % of the NGLs recovered from the gas



Why Gas is Processed

Cleanup – Remove impurities so that the residue gas meets pipeline specifications

 Economic – NGL products are worth more as individual products than if sold as natural gas

Pipeline Quality Gas

Minimal CO₂ or H₂S



Btu of the gas between 935 and 1035
 Btu's per cubic foot

Cleanup Gas the Wet Gas

- Both CO₂ and H₂O must be removed from the wet gas delivered to a plant so that the plant residue gas meets pipeline specifications
- While there is a market for CO₂ and H₂S, the sale of these products is a byproduct for processing plants
- Basically a breakeven deal at best



ONRR "Unbundling" Project

- ONRR has consistently held the position that costs incurred to make gas marketable are production costs and cannot be used to reduce royalty on federal leases
- Their current "unbundling" project is an attempt to quantify costs of services performed by gas plants that cleanup gas to make it marketable
 - Dehydration
 - Compression



Economics of NGL Recovery

	Btu Per	Minir	Minimum Product Price When Gas Price \$ per Mmbtu				
Product	Gallon	\$2.00	\$3.00	\$4.00	\$5.00	\$6.00	\$7.00
Ethane Propane Iso-Butane N-Butane Pentanes+	66,473 91,735 99,860 103,952 115,000	\$ 0.1329 0.1835 0.1997 0.2079 0.2300	\$ 0.1994 0.2752 0.2996 0.3119 0.3450	\$ 0.2659 0.3669 0.3994 0.4158 0.4600	\$ 0.3324 0.4587 0.4993 0.5198 0.5750	\$ 0.3988 0.5504 0.5992 0.6237 0.6900	\$ 0.4653 0.6421 0.6990 0.7277 0.8050



Breakeven Gas Price

Droduot	Btu Per	Current Price	Equilavent Gas Price \$ / Mmbtu
Product	Gallon	Pilce	φ/iviiTiblu
Ethane Propane Iso-Butane N-Butane Pentanes+	66,473 91,735 99,860 103,952 115,000	\$0.225 0.529 0.680 0.638 1.180	\$3.38 5.77 6.81 6.14 10.26

Gas Processing Spread

 Based on a current gas spot price of \$2.60 per Mmbtu @ Henry Hub

Ethane price \$0.225 per gallon @ Mt Belvieu

Ethane a break even at best

Margins on other NGL products okay



Steps in Gas Plant Accounting

1. Calculate total plant production



- 2. Calculate theoretical volumes of NGLs and residue gas delivered through each measurement point
- Allocate total plant production to each measurement point based on theoreticals
- 4. Determine the payment to each delivery point based on the gas purchase or processing agreement

Gas Plant Accounting

All about allocations

All allocations are wrong



- Goals of allocations
 - Reasonable
 - Fair
 - Consistent

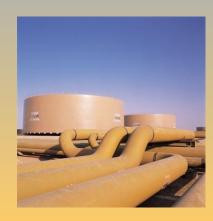


Plant Production

Total of all sales and deliveries

Plus Ending Inventory

Less Beginning Inventory



Plant Production Propane (Gallons)

0,000

Delivered to Pipelines 50,000

Loaded on Rail Cars 20,000

Total Sales 170,000

Ending Inventory 30,000

Beginning Inventory (25,000)

Propane Production 175,000

Calculating Theoretical Gallons

 An orifice meter measures the Mcf gas delivered through each measurement point each month

 A sample of the gas is taken at each measurement point and the GPM content is determined

Calculating Theoretical Gallons

	Mcf	
Gas Volume	35,000	
		Theoretical
Product	GPM	Gallons
Propane	1.350	47,250
Iso-Butane	0.674	23,590
N-Butane	0.982	34,370
Pentanes +	<u>1.346</u>	47,110
Totals	4.352	152,320

Assume Plant Production and Total Theoreticals as Follows

	Total Gallons				
Product	Production	Theoretical			
Propane	500,000	600,000			
Iso-Butane	250,000	280,000			
N-Butane	350,000	340,000			
Pentanes +	550,000	560,000			
Totals	1,650,000	1,780,000			

Allocation of Plant Production

		Total	
	Theoretical	Theoretical	Percent
Product	Gallons	Gallons	Theoretical
Propane	47,250	600,000	7.87500%
Iso-Butane	23,590	280,000	8.42500%
N-Butane	34,370	340,000	10.10882%
Pentanes +	47,110	560,000	8.41250%
Totals	152,320	1,780,000	

	Plant		Allocated
	Production	Percent	Production
Product	Gallons	Theoretical	Gallons
Propane	500,000	7.87500%	39,375
Iso-Butane	250,000	8.42500%	21,063
N-Butane	350,000	10.10882%	35,381
Pentanes +	550,000	8.41250%	46,269
Totals	1,650,000		142,087

Residue Gas

Amount of residue gas determined by measurement:

- Residue gas delivered to pipeline for sale
- All measured and estimated fuel volumes
- Measured volume of gas delivered back to the producers for lease use



Allocation of Residue Gas

- Nothing adds up
- Plant inlet volume different that the sum of the field meters plus field compression fuel
- Plant inlet volume different that the sum of residue gas, plant fuel and product shrinkage
- Must make some allowance for gas measurement error



Allocation of Residue Gas

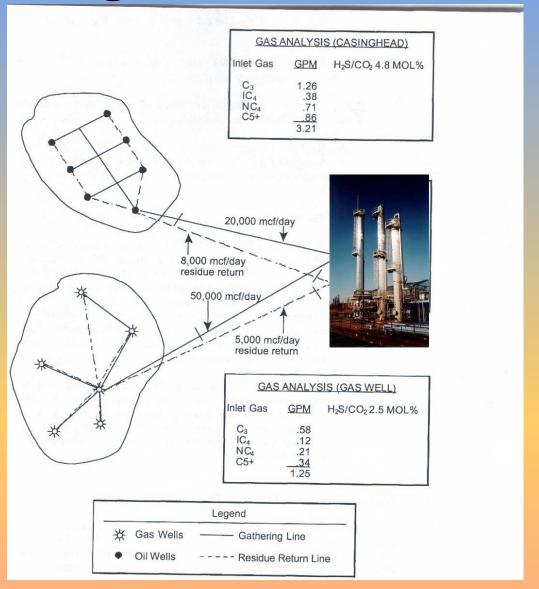
 Allocation to each measurement point based on theoretical residue gas remaining

 There are multiple ways to calculate theoretical residue gas remaining

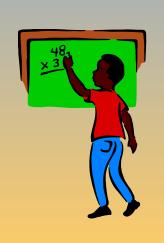
Hardest part of gas plant allocations



Big Time Schematic



Big Time Theoretical Residue Gas



1.00000000000000

Less: acid gas mol %

Less: product shrinkage factor

Residue gas factor

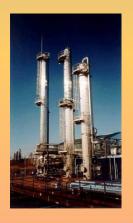
Theoretical Residue = Inlet Gas Volume x Residue Gas Factor

Big Time Processing Plant Product Shrinkage Factors

	Product
C3+ GPM	Shrinkage Factor
05	0.01125
.5 1.0	0.03375
1.0 -1.5	0.05625 橅
1.5 - 2.0	0.07875
2.0 - 2.5	0.10125
2.5 - 3.0	0.12375
3.0 - 3.5	0.14625
3.5 - 4.0	0.16875
4.0 - 4.5	0.19125
4.5 - 5.0	0.21375

Big Time Processing Plant Residue Gas Factors

Producer		Acid Gas	Shrinkage Factor	Residue Factor
Casinghead Gas	1.00000	0.04800	0.14625	0.80575
Gas Well Gas	1.00000	0.02500	0.05625	0.91875



Big Time Processing Plant Schedule of Processing Fees

Mol %	Processing Fee
H2S + CO2	\$0.00 / Mcf
0% - 1%	\$0.02
1% - 2%	0.04
2% - 3%	• 0.06
3% - 4%	0.08
4% - 5%	→ 0.10 🛣
5% - 6%	0.12
6% - 7%	0.14
7% - 8%	0.16
8% - 9%	0.18
9% - 10%	0.20
Over 10%	0.25



Residue Returned to Lease

\$0.05 per Mcf returned

Big Time Plant Contracts

Casinghead gas purchase contract

Price paid for the gas:

- 75% of the value of NGL's
- 90% of the value of residue gas
- Less processing fees
 - Acid gas removal
 - Residue gas returned



Big Time Contracts

Gas well gas processing agreement

Processing fees

- -40% of the NGL's
- Processing fees
 - Acid gas removal
 - Residue gas returned

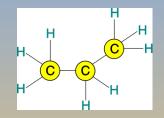


Big Time Processing Plant NGL Allocation April 2014

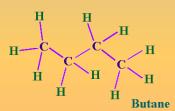
	Casinghead Gas						
Volume Delivered Mcf	Product	GPM	Theoretical Gallons	% of Theoretical	Allocated Production		
IVIOI	1 100000	OI IVI	Galloris	meoretical	1 Toddollon		
600,000	Propane	1.26	756,000	0.464944649	557,934		
	Iso-Butane	0.38	228,000	0.558823529	209,559		
	N-butane	0.71	426,000	0.574898785	405,304		
	Pentanes+	<u>0.86</u>	516,000	0.502923977	505,439		
	Totals	<u>3.21</u>	1,926,000		1,678,235		

	Gas Well Gas						
Volume Delivered Mcf	Product	GPM	Theoretical Gallons	% of Theoretical	Allocated Production		
1,500,000	Propane Iso-Butane N-butane Pentanes+ Totals	0.58 0.12 0.21 <u>0.34</u> <u>1.25</u>	870,000 180,000 315,000 510,000 1,875,000	0.535055351 0.441176471 0.425101215 0.497076023	642,066 165,441 299,696 499,561 1,606,765		

Total Plant				
	Total	Total		
	Theoretical	Plant		
Product	Production	Production		
Propane	1,626,000	1,200,000		
Iso-Butane	408,000	375,000		
N-butane	741,000	705,000		
Pentanes+	1,026,000	1,005,000		
Totals	3,801,000	_3,285,000		
				











			Mcf		Mcf
	Mcf	Residue	Theoretical	% of	Allocated
System	Delivered	Factor	Residue	Theoretical	Residue
Casinghead Gas	600,000	0.80575	483,450	0.259699448	467,459
Gas Well Gas	1,500,000	0.91875	1,378,125	0.740300552	1,332,541
Totals	2,100,000		1,861,575	1.000000000	1,800,000

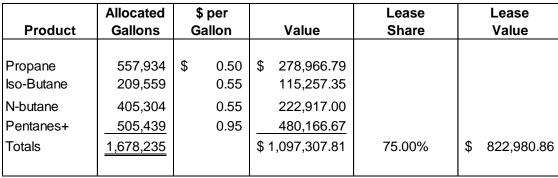


Plant Residue

1,800,000

Big Time Processing Plant Casinghead Gas Purchased April 2014







	Mcf				
Allocated	Residue	Residue	Residue Price	Residue	Lease
Residue	Returned	Sales	\$ per Mcf	Value	Value
467,459	240,000	227,459	\$3.92298	\$ 892,316.59	
			Lease Share	90.00%	\$ 803,084.93

Processing Fees

110000011191000				
	Mcf	Fee	Processing	Total Fee
Fee	Volume	\$ per Mcf	Fee	Deductions
Acid Gas	600,000	\$0.10	\$ 60,000.00	
Residue Returned	240,000	\$0.05	12,000.00	\$ 72,000.00

Net Due Producer \$ 1,554,065.79



Big Time Processing Plant Gas Well Gas Processed April 2014

NGLs

Product	Allocated Gallons	\$ per Gallon	Value	Lease Share	Lease Value
Propane Iso-Butane N-butane Pentanes+ Totals	642,066 165,441 299,696 499,561 1,606,765	\$ 0.50 0.55 0.55 0.95	\$ 321,033.21 90,992.65 164,833.00 474,583.33 \$ 1,051,442.19	60.00%	\$ 630,865.31



Residue Gas

	Mcf				
Allocated Residue	Residue Returned	Residue Sales	Residue Price \$ per Mcf	Residue Value	Lease Value
1,332,541	150,000	1,182,541	\$3.92298	\$ 4,639,081.82	
			Lease Share	100.00%	\$ 4,639,081.82

Processing Fees

	Mcf	Fee	Processing	Total Fee
Fee	Volume	\$ per Mcf	Fee	Deductions
Acid Gas	1,500,000	\$0.06	\$ 90,000.00	
Residue Returned	150,000	\$0.05	7,500.00	\$ 97,500.00

Net Due Producer \$5,172,447.14

Big Time Processing Plant Gross Margin April 2014

Sales

NGLs	\$ 1,517,884.69

Residue Gas 892,316.59

Processing Fees 97,500.00

Total Revenue \$ 2,507,701.27

Casinghead Gas Purchased 1,554,065.79

Gross Margin \$ 953,635.49

April NGL Sales

How in the world did you calculate NGL

sales?



April NGL Sales

100% of NGLs from casinghead gas

\$1,097,307.81

40% processing fee on gas well gas

420,576.88

Total NGL sales

\$1,517,884.69



Other Plant Sales

Residue gas (all from casinghead gas)



Processing fees (all from gas well gas)





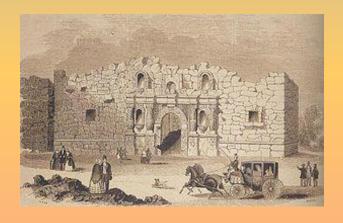
Big Time Processing Plant Proof on Income Allocation April 2014

100% Sales	Casinghead Gas	Gas Well Gas	Total
Natural Gas Liquids Residue Gas	\$ 1,097,307.81 892,316.59	\$ 1,051,442.19 4,639,081.82	\$ 2,148,750.00 5,531,398.41
Totals	\$ 1,989,624.40	\$ 5,690,524.01	\$ 7,680,148.41
Payments			
Casinghead Gas Producers Gas Well Gas Producers Plant Gross Margin	\$ 1,554,065.79 5,172,447.14 953,635.49		
Total Revenue	\$ 7,680,148.41		

Alamo Casualties

Texans – Between 182 and 257

Mexicans – 600 killed or wounded



Noted Americans Fighting for Texas

- Micajah Autry
- James Bonham

James Bowie

William Travis

Davy Crockett



Audit

A review to determine the accuracy and validity of records and reports or the conformity of procedures with established policy ...

Dictionary of Accounting Second Edition by Ralph Estes



Auditing



- Tried auditing twice
 - 1972 Internal auditing for Cities Service
 - 1998 Did several revenue audits
- Decided auditing not my thing
 - Not tough enough to be an auditor
 - Is anyone ever glad to see you?
- Here I am talking to you about auditing



Auditing Plant Payments

 Were leases that delivered gas to a processing plant paid correctly for all NGLs and residue gas?

- Underpayment to leases delivering gas to a plant could be due to:
 - Valuation of plant production and sales
 - Allocations of plant production and sales to measurement points

State & Federal Leases

- Fees to clean up gas delivered to a plant for processing may not be deductible:
 - Acid gas removal
 - Residue returned

- Other nondeductible fees
 - Gas compression
 - Gas dehydration





Staffing

 Does your department have the staff to audit all leases every year

Probably not

 Must audit properties that have the highest potential for additional revenue

Which Properties to Audit

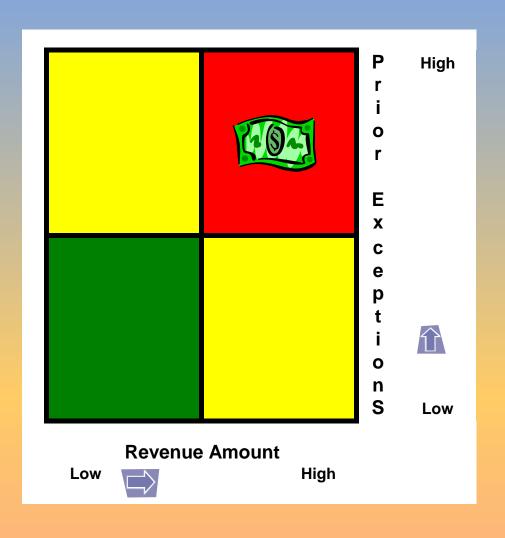
Revenue generated

Prior fluctuations and audit exceptions

New properties



Which Properties to Audit



New Properties

 Especially properties with large production and sales volumes

Warrant a detailed review

 Initial set-up problems tend to persist until uncovered and corrected

New Properties

 Review of first plant statements is especially important for gas sold or processed at gas plants

 Plants statements should be compared with the sales or processing agreement.

Plant may have set up the new property incorrectly

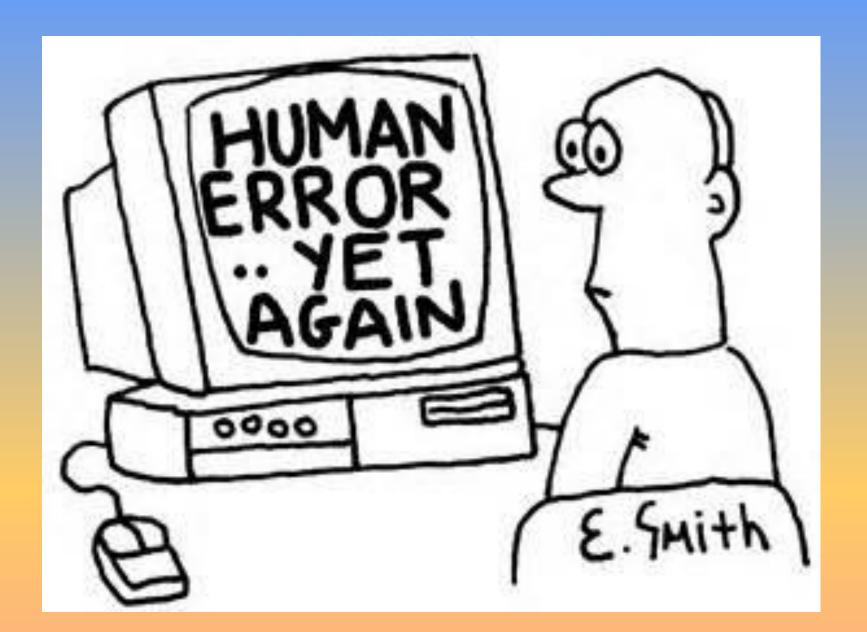


First Statement Received

	Payment For Natural Gas Liquids									
				Total	,					
			Theoretical	Theoretical	Percent	Plant	Allocated	Product	NGL	NGL
Mcf	Product	Gpm	Gallons	Gallons	Theoretical	Production	NGLs	Prices	Sales	Value
500,000	Propane	1.263	631,500	7,279,400	8.6751655%	5,000,000	433,758.28	\$ 0.80	\$ 347,006.62	
	Butanes	0.865	432,500	5,522,410	7.8317256%	4,000,000	313,269.03	0.90	281,942.12	
	Pentanes +	<u>0.562</u>	281,000	3,348,740	8.3912158%	2,800,000	234,954.04	1.00	234,954.04	
	Totals	2.690	1,345,000	16,150,550		11,800,000	981,981.34		\$ 863,902.79	
								Lease		
								Percent	70.00%	\$ 604,731.95
					Payment For F	Residue Gas				
			Total		Í			Residue	Residue	Residue
	Product	Theoretical	Theoretical	Percent	Actual	Allocated	Allocated	Returned	Sold	Value
Mcf	Shrinkage	Remaining	Remaining	Theoretical	Residue	Residue	Fuel			
500,000	31,362	468,638	5,638,368	8.3115916%	4,800,000	398,956	9,820	120,000	269,136	
							\$Mcf	\$2.60	\$699,754.63	
							ÇIVICI	Lease	Ç023,734.03	
								Percent	75.00%	524,815.97
							Total	, crocine	75.5070	324,013.37
										\$ 1.129.547.92
							Payment			\$ 1,129,547.92

First Statement Received

- Good looking statement
- Only problem, the lease percentages are wrong
- Plant paid 70% of liquids and 75% of residue gas
- Should have paid 75% of liquids and 80% of residue gas



First Statement Received

				Pavmen	t For Natural	Gas Liquids				
				Total						
			Theoretical	Theoretical	Percent	Plant	Allocated	Product	NGL	NGL
Mcf	Product	Gpm	Gallons	Gallons	Theoretical	Production	NGLs	Prices	Sales	Value
F00 000	D	4.262	624 500	7 270 400	0.67546550/	F 000 000	422.750.20	¢ 0.00	¢ 2.47,000,02	
500,000	Propane	1.263	631,500	7,279,400	8.6751655%		433,758.28	\$ 0.80	\$347,006.62	
	Butanes	0.865	432,500	5,522,410	7.8317256%		313,269.03	0.90	281,942.12	
	Pentanes +	<u>0.562</u>	281,000	3,348,740	8.3912158%		234,954.04	1.00	234,954.04	
	Totals	2.690	1,345,000	16,150,550		11,800,000	981,981.34		\$863,902.79	
								Lease		
								Percent	75.00%	\$ 647,927.0
				Payr	l nent For Resi	due Gas				
			Total	,				Residue	Residue	Residue
	Product	Theoretical	Theoretical	Percent	Actual	Allocated	Allocated	Returned	Sold	Value
Mcf	Shrinkage	Remaining	Remaining	Theoretical	Residue	Residue	Fuel			
500,000	31,362	468,638	5,638,368	8.3115916%	4,800,000	398,956	9,820	120,000	269,136	
							\$Mcf	\$2.60	\$699,754.63	
								Lease	,	
								Percent	80.00%	559,803.7
							Total			
							Payment			\$ 1,207,730.7
										-

New Properties

207,730.79
_

Payment Received 1,129,547.92

Difference \$ 78,182.87

State Royalty \$ 9,772.86

Working interest owners \$ 68,410.01

Valuing Plant Production & Sales

 Gallons of plant production reported in the plant allocation statements

Prices of NGL sales



Underreporting Plant Production How to Check

- Plant production volumes are reported to government agencies
 - Texas Railroad Commission report R-3

 Volumes reported to these agencies should be the same volumes entered into the plant allocation system

Underreporting Plant Production

Fairly rare, to easy to catch



 If the plant operator wants to cheat the gas producers, there are more smarter ways to do it

Undervaluing NGL Sales

 Sell products to subsidiary companies at below market value

 Undervalue products that were part of an exchange agreement

 Undervalue products that were part of a purchase and resale arrangement

 The gas plant sells all plant products to a subsidiary marketing company

 The marketing company sell the products to third party companies at higher prices





Sales to subsidiary marketing company

 ONRR regulations provide that plant products should be valued at prices received by the marketing company

This would be a good rule for you to follow

	Gallons	Sales	Market
Product	Sold	Price	Price
Propane	500,000	\$0.70	\$ 0.80
Butanes	300,000	0.80	0.90
Pentanes +	240,000	1.00	1.10

	Sales					
Product	Reported	Actual	Difference			
Propane	\$350,000	\$400,000	\$ 50,000			
Butanes	240,000	270,000	30,000			
Pentanes +	240,000	264,000	24,000			
Totals	\$830,000	\$934,000	\$ 104,000			
	Lease Share	75.00%	\$ 78,000			

Lease Owners

	Revenue	Additional
Owner	Interest	Sales
State Royalty	12.50%	\$ 9,750
Working Interest	<u>87.50%</u>	68,250
Totals	<u>100.00</u> %	\$ 78,000

Exchanging NGL Products

 Company A delivers NGL products to Company B at one location

 Company B delivers NGL products to Company A at another location

 Since the products were not sold, how should they be valued?

Exchange Agreements



Texas Plant



Kansas Plant

Exchanging NGL Products

 Each company should value the products based on spot prices for NGLs (Mont Belvieu, Texas or Conway, Kansas)

Adjustments for transportation and fractionation



Purchase and Resale Agreements

 Company A sells NGL products to Company B at one location

 Company B sells identical NGL products to Company A at another location

 Each sale appears to be an independent sale to an unrelated third party

Purchase and Resale Agreements

Extremely hard to spot





 Would need to know of both transactions to put the two sales together



One Project I Worked On

 Group of lawyers suing a gas plant in Florida

"I know they are cheating us"

"You find out how"



Partners Taking Products in Kind

All partners were taking the pentanes+ in kind

 There was a \$5.00 per barrel or \$0.119 per gallon difference between the high and low valuation

Something is not right



- Understating volumes delivered from your lease
 - Metered gas volumes
 - NGL content
- Overstating volumes delivered from other leases
 - Metered gas volumes
 - NGL content
- Phantom leases



Misallocation of Plant Production Example

State has 12.5% royalty interest in Lease B

 Lease B is credited with 75% of the value of all liquids attributable to the lease



Understate Volumes Lease B

Report too low Mcf volume delivered to the plant, or

 Report too low GPM content on gas delivered

 Both errors result in lower allocations of plant NGL volumes

Actual Gas Volumes and Content

Lease A	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	500,000	Propane	1.237	618,500	0.54792700	487,655
		Butanes	0.982	491,000	0.53300043	466,375
		Pentanes +	<u>1.034</u>	517,000	0.53789731	476,039
		Totals	3.253	1,626,500		1,430,070
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product		Gallons	Theoretical	Production
	450,000	Propane	1.134	510,300	0.45207300	402,345
		Butanes	0.956	430,200	0.46699957	408,625
		Pentanes +	<u>0.987</u>	444,150	0.46210269	408,961
		Totals	3.077	1,384,650		1,219,930
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	950,000	Propane		1,128,800		890,000
		Butanes		921,200		875,000
		Pentanes +		961,150		885,000
		Totals		3,011,150		2,650,000

Under Reported Volumes Lease B

Lease A	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	500,000	Propane	1.237	618,500	0.55348737	492,604
		Butanes	0.982	491,000	0.53858979	471,266
		Pentanes +	<u>1.034</u>	517,000	0.54347826	480,978
		Totals	3.253	1,626,500		1,444,848
Lease B	Mcf			Theoretical	Percent	Allocated
L 🛶	Delivered	Product		Gallons	Theoretical	Production
_	440,000	Propane	1.134	498,960	0.44651263	397,396
		Butanes	0.956	420,640	0.46141021	403,734
		Pentanes +	<u>0.987</u>	434,280	0.45652174	404,022
		Totals	3.077	1,353,880		1,205,152
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	940,000	Propane		1,117,460		890,000
		Butanes		911,640		875,000
		Pentanes +		951,280		885,000
		Totals		2,980,380		2,650,000

Under Reported Volumes Lease B

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	4,949	\$0.80	\$ 3,958.98	\$ 2,969.24
	Butanes	4,891	0.85	4,157.09	3,117.81
	Pentanes +	4,939	1.20	5,926.97	4,445.23
	Totals	14,779		\$ 14,043.04	\$ 10,532.28
Lease B		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	(4,949)	\$0.80	\$ (3,958.98)	\$ (2,969.24)
	Butanes	(4,891)	0.85	(4,157.09)	(3,117.81)
	۱ .	(4.020)	1.20	(5,926.97)	(4,445.23)
	Pentanes +	(4,939)	1.20	(3,320.37)	(4,443.23)

Understate Volumes From Lease B Owners Lease B

State Royalty

\$ 1,316.54

Working Interest 9,215.74

Total Lease

\$10,532.28



Misallocation of Plant Production

Under Reported GPM Content Lease B

Lease A	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	500,000	Propane	1.237	618,500	0.55344280	492,564
		Butanes	0.982	491,000	0.53852481	471,209
		Pentanes +	<u>1.034</u>	517,000	0.54349540	480,993
		Totals	3.253	1,626,500		1,444,767
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	þ	Gallons	Theoretical	Production
	450,000	Propane	1.109	499,050	0.44655720	397,436
		Butanes	0.935	420,750	0.46147519	403,791
		Pentanes +	0.965	434,250	0.45650460	404,007
		Totals	3.009	1,354,050		1,205,233
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	950,000	Propane		1,117,550		890,000
		Butanes		911,750		875,000
		Pentanes +		951,250		885,000
		Totals		2,980,550		2,650,000

Misallocation of Plant Production

Under Reported GPM Content Lease B

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	4,909	\$0.80	\$ 3,927.25	\$ 2,945.44
	Butanes	4,834	0.85	4,108.76	3,081.57
	Pentanes +	4,954	1.20	5,945.17	4,458.88
	Totals	14,697		\$ 13,981.18	\$ 10,485.88
Lease B		Allocated			Lease
					LCasc
	Product	Production	Value	Revenue	75.00%
	Product Propane		Value \$0.80	Revenue \$ (3,927.25)	
		Production			75.00%
	Propane	Production (4,909)	\$0.80	\$ (3,927.25)	75.00% \$ (2,945.44)

Understate GPM Lease B Owners Lease B

State Royalty

\$ 1,310.74

Working Interest

9,175.14

Total Lease

\$10,485.88



Misallocation of Plant Production Double Whammy

Double Whammy Lease B

Lease A	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	500,000	Propane	1.237	618,500	0.55898993	497,501
		Butanes	0.982	491,000	0.54410461	476,092
		Pentanes +	<u>1.034</u>	517,000	0.54906542	485,923
		Totals	3.253	1,626,500		1,459,515
Lease B	Mcf		-	Theoretical	Percent	Allocated
	Delivered	Product	þ	Gallons	Theoretical	Production
•	440,000	Propane	1.109	487,960	0.44101007	392,499
_		Butanes	0.935	411,400	0.45589539	398,908
		Pentanes +	0.965	424,600	0.45093458	399,077
		Totals	3.009	1,323,960		1,190,485
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	940,000	Propane		1,106,460		890,000
		Butanes		902,400		875,000
		Pentanes +		941,600		885,000
		Totals		2,950,460		2,650,000



Double Whammy



Double Whammy

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	9,846	\$0.80	\$ 7,876.81	\$ 5,907.60
	Butanes	9,716	0.85	8,258.73	6,194.05
	Pentanes +	9,884	1.20	11,860.53	8,895.40
	Totals	29,446		\$ 27,996.07	\$ 20,997.05
Lease B		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	(9,846)	\$0.80	\$ (7,876.81)	\$ (5,907.60)
	Butanes	(9,716)	0.85	(8,258.73)	(6,194.05)
	Pentanes +	(9,884)	1.20	(11,860.53)	(8,895.40)
	Totals	(29,446)		\$(27,996.07)	\$(20,997.05)



Double Whammy Owners Lease B



State Royalty

\$ 2,624.63

Working Interest

18,372.42



Total Lease

\$20,997.05

Under Reporting Gas Delivered to the Plant How to Check

 Make sure the plant operator calibrates the gas meter at the time intervals specified in the contract

Have an expert witness the meter calibration

 Install a check meter to verify the gas volume, if the gas volume delivered to the plant justifies the costs

Under Reporting Gas Delivered to the Plant How to Check

 Might consider getting the orifice charts from the plant operator

Integrate the charts yourself

 Compare your calculated volumes with the volumes calculated by the plant operator



Gas Analysis How to Check



- Take an independent gas sample and compare with the gas analysis used by the plant operator
- Witness the sampling of gas taken from your leases
- Beware of large changes when new gas samples are taken by the plant operator
- Beware if plant efficiencies are too high

Under Deliveries From Your Lease Increasing Plant Efficiency

	Plant Efficiency			
Actual	Total Plant Production Total Theoretical	2,650,000 3,011,150	=	88.00624%
Reduced Volumes	Total Plant Production Total Theoretical	<u>2,650,000</u> 2,980,380	=	88.91484%
Reduced Gpm	Total Plant Production Total Theoretical	2,650,000 2,980,550	=	88.90976%
Double Whammy	Total Plant Production Total Theoretical	2,650,000 2,950,460	=	89.81650%

Under Deliveries From Your Lease Increasing Plant Efficiency

These changes in plant efficiency fairly small

 Would be very difficult to pick up based solely on changes in plant efficiency



Overstate Volumes From Other Leases

 Overstate Mcf volumes delivered to the plant from other leases

Overstate Gpm content on other leases

 Both errors result in lower allocation of plant production to your lease

Misallocation of Plant Production

Over Reported Volumes Lease A

Lease A	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	510,000	Propane	1.237	630,870	0.55282736	492,016
_		Butanes	0.982	500,820	0.53792615	470,685
		Pentanes +	<u>1.034</u>	527,340	0.54281567	480,392
		Totals	3.253	1,659,030		1,443,094
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product		Gallons	Theoretical	Production
	450,000	Propane	1.134	510,300	0.44717264	397,984
		Butanes	0.956	430,200	0.46207385	404,315
		Pentanes +	<u>0.987</u>	444,150	0.45718433	404,608
		Totals	3.077	1,384,650		1,206,906
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	960,000	Propane		1,141,170		890,000
		Butanes		931,020		875,000
		Pentanes +		971,490		885,000
		Totals		3,043,680		2,650,000

Misallocation of Plant Production

Over Reported Volumes Lease A

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	4,361	\$0.80	\$ 3,489.06	\$ 2,616.79
	Butanes	4,310	0.85	3,663.50	2,747.62
	Pentanes +	4,353	1.20	5,223.30	3,917.48
	Totals	13,024		\$ 12,375.86	\$ 9,281.89
Lease B		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	(4,361)	\$0.80	\$ (3,489.06)	\$ (2,616.79)
	Butanes	(4,310)	0.85	(3,663.50)	(2,747.62)
	Pentanes +	(4,353)	1.20	(5,223.30)	(3,917.48)
	Totals	(13,024)		\$(12,375.86)	\$ (9,281.89)

Overstate Gas Volumes Lease A Owners Lease B

State Royalty \$1,160.24

Working Interest <u>8,121.65</u>



Total Lease

\$9,281.89

Misallocation of Plant Production

Over Reported GPM Lease A

Lease A	Mcf		-	Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	500,000	Propane	1.275	637,500	0.55541035	494,315
		Butanes	1.012	506,000	0.54048280	472,922
		Pentanes +	<u>1.066</u>	533,000	0.54546385	482,736
		Totals	3.353	1,676,500		1,449,973
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product		Gallons	Theoretical	Production
	450,000	Propane	1.134	510,300	0.44458965	395,685
		Butanes	0.956	430,200	0.45951720	402,078
		Pentanes +	0.987	444,150	0.45453615	402,264
		Totals	3.077	1,384,650		1,200,027
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	950,000	Propane		1,147,800		890,000
		Butanes		936,200		875,000
		Pentanes +		977,150		885,000
		Totals		3,061,150		2,650,000

Misallocation of Plant Production

Over Reported GPM Lease A

Lease A		Allocated			Interest
	Product	Production	Value	Revenue	12.50%
	Propane	6,660	\$0.80	\$ 5,328.14	\$ 3,996.11
	Butanes	6,547	0.85	5,565.01	4,173.76
	Pentanes +	6,696	1.20	8,035.66	6,026.75
	Totals	19,904		\$ 18,928.82	\$ 14,196.61
Lease B		Allocated			Interest
	Product	Production	Value	Revenue	12.50%
	Propane	(6,660)	\$0.80	\$ (5,328.14)	\$ (3,996.11)
	Butanes	(6,547)	0.85	(5,565.01)	(4,173.76)
	Pentanes +	(6,696)	1.20	(8,035.66)	(6,026.75)
	Totals	(19,904)		\$(18,928.82)	\$(14,196.61)

Overstate GPM Lease A Owners Lease B

State Royalty

\$ 1,774.58

Working Interest

12,422.03



Total Lease

\$14,196.61

Misallocation of Plant Production

Double Whammy

Lease A	Mcf			Theoretical	Percent	Allocated
Lease A		Due els et				
	Delivered	Product	Gpm	Gallons	Theoretical	Production
	510,000	Propane	1.275	650,250	0.56029469	498,662
		Butanes	1.012	516,120	0.54539691	477,222
		Pentanes +	<u>1.066</u>	543,660	0.55036900	487,077
		Totals	3.353	1,710,030		1,462,961
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product		Gallons	Theoretical	Production
	450,000	Propane	1.134	510,300	0.43970531	391,338
		Butanes	0.956	430,200	0.45460309	397,778
		Pentanes +	0.987	444,150	0.44963100	397,923
		Totals	3.077	1,384,650		1,187,039
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	960,000	Propane		1,160,550		890,000
		Butanes		946,320		875,000
		Pentanes +		987,810		885,000
		Totals		3,094,680		2,650,000





Misallocation of Plant Production

Double Whammy

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	11,007	\$0.80	\$ 8,805.79	\$ 6,604.34
	Butanes	10,847	0.85	9,219.88	6,914.91
	Pentanes +	11,037	1.20	13,244.93	9,933.70
	Totals	32,892		\$ 31,270.60	\$ 23,452.95
Lease B		Allocated			lease
	Product	Production	Value	Revenue	75.00%
	_	(_	
	Propane	(11,007)	\$0.80	\$ (8,805.79)	\$ (6,604.34)
	Propane Butanes	(11,007) (10,847)	\$ 0.80 0.85	\$ (8,805.79) (9,219.88)	\$ (6,604.34) (6,914.91)
		` ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′ ′	•	. , , , , ,	, ,





Double Whammy Owners Lease B

State Royalty

\$ 2,931.62

Working Interest

20.521.33



\$23,452.95







- Under report your lease
 - Under report Mcf volume delivered
 - Under report GPM content of the gas

- Over report other leases
 - Over report Mcf volume from other leases
 - Over report GPM content of other leases









Quadruple Whammy

Lease A	Mcf		-	Theoretical	Percent	Allocated
	Delivered	Product	Gpm	Gallons	Theoretical	Production
📫	510,000	Propane	1.275	650,250	0.57129177	508,450
· •		Butanes	1.012	516,120	0.55645161	486,895
		Pentanes +	<u>1.066</u>	543,660	0.56148142	496,911
		Totals	3.353	1,710,030		1,492,256
Lease B	Mcf			Theoretical	Percent	Allocated
	Delivered	Product	•	Gallons	Theoretical	Production
	440,000	Propane	1.109	487,960	0.42870823	381,550
l '		Butanes	0.935	411,400	0.44354839	388,105
		Pentanes +	<u>0.965</u>	424,600	0.43851858	388,089
		Totals	3.009	1,323,960		1,157,744
Totals	Mcf			Total		Plant
	Delivered	Product		Theoretical		Production
	950,000	Propane		1,138,210		890,000
		Butanes		927,520		875,000
		Pentanes +		968,260		885,000
		Totals		3,033,990		2,650,000









Quadruple Whammy

Lease A		Allocated			Lease
	Product	Production	Value	Revenue	75.00%
	Propane	20,795	\$0.80	\$ 16,635.71	\$ 12,476.78
	Butanes	20,520	0.85	17,441.81	13,081.36
	Pentanes +	20,872	1.20	25,046.32	18,784.74
	Totals	62,186		\$ 59,123.85	\$ 44,342.89
Lease B		Allocated			Lease
Lease B	Product	Allocated Production	Value	Revenue	Lease 75.00%
Lease B	Product Propane		Value \$0.80	Revenue \$(16,635.71)	
Lease B		Production			75.00%
Lease B	Propane	Production (20,795)	\$0.80	\$(16,635.71)	75.00% \$(12,476.78)





Quadruple Whammy Owners Lease B

State royalty

\$ 5,542.86

Working Interest 38,800.03





Verifying Data From Other Leases Much More Difficult

 May be hundreds of measurement points where gas enters the plant gathering system

Must rely of the integrity of the plant operator

Best you can do is the "smell test"



Overstating Gas Volumes From Other Leases How to Check

 Ratio of theoretical volumes to plant production (plant efficiency) should be fairly steady over time

 Change in ratio should be investigated if significant



Changes in Plant Efficiency

	Plant Efficiency			
Actual	Total Plant Production Total Theorerical	2,650,000 3,011,150	=	88.0062435%
Increased Volumes	Total Plant Production Total Theorerical	<u>2,650,000</u> 3,043,680	=	87.0656574%
Increased GPM	Total Plant Production Total Theorerical	2,650,000 3,016,150	=	87.8603518%
Double Whammy	Total Plant Production Total Theorerical	<u>2,650,000</u> 3,098,000	=	85.5390575%
Quadruple Whammy	Total Plant Production Total Theorerical	<u>2,650,000</u> 3,033,990	=	87.3437289%

 Increases in plant efficiency from understating theoretical production from one lease

 Offset by overstating theoretical production from other leases

Make it hard to catch



Phantom Leases



- Plant operator could make up some phantom leases that don't exist
- Give these phantom leases gas volumes and GPM tests
- This would create theoretical volumes for these leases
- Which would result in allocating plant production to these leases
- Take plant production away from other leases

Plant Allocations Without Phantom Lease

	Payment For Natural Gas Liquids									
				Total						
			Theoretical	Theoretical	Percent	Plant	Allocated	Product	NGL	NGL
Mcf	Product	Gpm	Gallons	Gallons	Theoretical	Production	NGLs	Prices	Sales	Value
500,000	Propane	1.263	631,500	6,500,180	9.71511558%	5,000,000	485,755.78	\$ 0.80	\$ 388,604.62	
	Butanes	0.865	432,500	5,000,230	8.64960212%	4,000,000	345,984.08	0.90	311,385.68	
	Pentanes +	0.562	281,000	3,000,440	9.36529309%	2,800,000	262,228.21	1.10	288,451.03	
	Totals	2.690	1,345,000	14,500,850		11,800,000	1,093,968.07		\$ 988,441.33	
								Lease		
								Percent	75.00%	\$ 741,331.00

	Payment For Residue Gas									
			Total							
	Product	Theoretical	Theoretical	Percent	Actual	Allocated	Allocated	Residue	Residue	Residue
Mcf	Shrinkage	Remaining	Remaining	Theoretical	Residue	Residue	Fuel	Returned	Sold	Value
500,000	34,948	465,052	5,100,000	9.1186728%	4,800,000	437,696	10,940	120,000	306,757	
							\$ Mcf	\$2.60 Lease	\$797,567.19	
								Percent	80.00%	638,053.75
							Total Payment			\$ 1,379,384.75

Phantom Lease



				Old Total	New Total
			Theoretical	Theoretical	Theoretical
Mcf	Product	Gpm	Gallons	Gallons	Gallons
540,000	Propane	1.443	779,220	6,500,180	7,279,400
	Butanes	0.967	522,180	5,000,230	5,522,410
	Pentanes +	0.645	348,300	3,000,440	3,348,740
			_		
Totals		3.055	1,649,700	14,500,850	16,150,550

Plant Allocations With Phantom Lease

Payment For Natural Gas Liquids										
				Total		-				
			Theoretical	Theoretical	Percent	Plant	Allocated	Product	NGL	NGL
Mcf	Product	Gpm	Gallons	Gallons	Theoretical	Production	NGLs	Prices	Sales	Value
500,000	Propane	1.263	631,500	7,279,400	8.6751655%		433,758.28	\$ 0.80	\$347,006.62	
	Butanes	0.865	432,500	5,522,410	7.8317256%	4,000,000	313,269.03	0.90	281,942.12	
	Pentanes +	<u>0.562</u>	281,000	3,348,740	8.3912158%	2,800,000	234,954.04	1.00	234,954.04	
	Totals	2.690	1,345,000	16,150,550		11,800,000	981,981.34		\$863,902.79	
								Lease		
								Percent	75.00%	\$ 647,927.09
				Pay	ment For Re	sidue Gas				
			Total					Residue	Residue	Residue
	Product	Theoretical	Theoretical	Percent	Actual	Allocated	Allocated	Returned	Sold	Value
Mcf	Shrinkage	Remaining	Remaining	Theoretical	Residue	Residue	Fuel			
500,000	31,362	468,638	5,638,368	8.3115916%	4,800,000	398,956	9,820	120,000	269,136	
							\$Mcf	\$2.60 Lease	\$699,754.63	
								Percent	80.00%	559,803.70
							Total	i cicciii	30.0070	333,003.70
							Payment			\$ 1,207,730.79
							rayineill			<i>μ</i> 1,207,730.79

Underpayment to Owners

Payment with phantom lease Payment without phantom lease	\$ 1,207,730.79 1,379,384.75
Difference	\$ (171,653.96)
State Royalty	\$ (21,456.75)
Working interest owners	\$ (150,197.22)

Phantom Leases How to Check

- If you have the time or can hire someone
- Walk the gathering system and account for all measurement points included in the plant allocation statement
- With a large gathering system with hundreds of measurement points, this could take a while



Phantom Leases How to Check

 For a very large gathering system with hundreds of measuring points

 May pick a random sample of measuring points to verify that they exist

Over time might catch a crooked plant operator

Auditing Gas Plant Statements

Hardest auditing job

Even in gas from your lease is correct

 May still be underpaid if other leases are overstated

Good luck, your going to need it

Battle of San Jacinto

April 21, 1836
Battle lasted about 20 minutes
630 Mexican soldiers killed, 730 captured
9 Texans killed

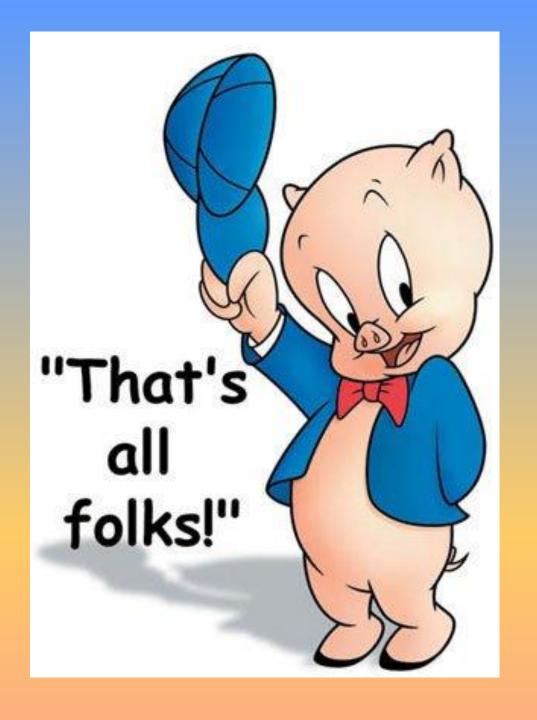


San Jacinto Monument



Questions





Thanks For Being Here

